APR 23 1999

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

THEODORE JOHN KACZYNSKI
Petitioner,

CIV. S-99- 816 GEB P

Criminal Actions No
CR-S-96-259 GEB
and
✓ CR-S-98-21 GEB

v.

UNITED STATES
Respondent

COMBINED VERIFIED PRO SE MOTION UNDER 28 U.S.C. § 2255 TO VACATE GUILTY PLEAS AND SENTENCES AND SET ASIDE CONVICTIONS; MOTION FOR LEAVE TO AMEND THIS MOTION FOLLOWING SUFFICIENT TIME TO INVESTIGATE AND PRESENT ADDITIONAL FACTS OR CLAIMS ABOUT WHICH THE INCARCERATED, PRO SE PETITIONER IS AT PRESENT UNAWARE; MOTION TO RECUSE THE HONORABLE GARLAND E. BURRELL, JR.

Theodore John Kaczynski
04475-046
P.O. Box 8500
Florence CO 81226-8500

Pro Se

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ACKNOWLEDGEMENTS

I would like to thank Professor Michael Mello, of Vermont Law School, and three law students who worked under his direct supervision, Ingrid Bussom, Jason Ferreira, and Rich Hentz, without whose generous, pro bono assistance I could not have prepared this petition. I emphasize strongly that Professor Mello and his students are in no way responsible for the defects of this petition. Owing to certain circumstances, I was obliged to prepare this petition in great haste within a period of little more than two weeks. Consequently, I was not able to take full advantage of the ideas and legal information with which Professor Mello and his students had previously provided me, nor was I able to submit this petition to them for their criticisms.

I would also like to acknowledge the fact that Quin Denvir and Judy Clarke generously, efficiently, and promptly provided me with documents that I needed for the preparation of this petition, and helped me with mechanical details such as the wording of the Verification and the Certificate of Service, even though they knew that this petition would be sharply critical of their performance in my case.

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